UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

XOCHITL HERNANDEZ and CESAR MATIAS, for themselves and on behalf of a class of similarly-situated individuals,	) Civil Action No. 5:16-cv-00620-JGB-KKx
Plaintiffs-Petitioners,	) **Declaration of Jean King**
v.	)
JEFFERSON B. SESSIONS III, U.S. Attorney, *et al.*,	) Hon. Rosalyn M. Chapman
Defendants-Respondents.	)

I, Jean King, declare as follows:

1. I serve as the General Counsel of the Executive Office for Immigration Review (EOIR). In this capacity, I manage the Office of General Counsel (OGC) and provide legal counsel on matters pertaining to the Immigration and Nationality Act and other laws and procedures as they relate to EOIR, among other duties. I have served in this position since 2015.
2. I have prepared this declaration to explain in detail, on a month-to-month timeline, the steps that EOIR has taken to comply with the U.S. District Court (C.D. Cal.) Order Granting Plaintiffs' Motion to Compel and

Vacating the December 7, 2017 Hearing ("Order") (Dkt. No. 129) requiring Defendants to respond to Interrogatories and Requests for Production of Documents from Plaintiffs.[1]

November 2017 – Proactive EOIR Request for eDiscovery Data

3. On November 28, 2017, before the Order was issued, EOIR OGC proactively identified approximately 123 individuals having possibly responsive electronic files and emails to Plaintiffs' First Set of Requests For Production of Documents to Defendant Department of Justice ("Plaintiffs' First Set of RFPs") ("custodians") for the time period beginning January 1, 2012 to the date of collection, and forwarded this eDiscovery request to EOIR's Office of Information Technology ("OIT"). EOIR OIT then contacted the Department of Justice's Justice Management Division (JMD) to coordinate retrieval of a copy of those employees' files and emails, from the Justice Consolidated Office Network (JCON) Servers where they are maintained. The JCON Servers are currently located in Rockville, Maryland and Pocatello, Idaho.

December 2017 – Upload Issues to EOIR's Clearwell

4. By December 12, 2018, after having electronically received the custodians' emails and files from JMD, EOIR OIT began attempting to load the data onto its local server, which would then provide EOIR OGC

[1] The Order's requirement that Defendants respond within 14 days was subsequently extended.

with access to the data through the Veritas eDiscovery platform, "Clearwell." Clearwell would then allow EOIR OGC to filter and run appropriate queries on that data for responsive information to the discovery requests.

5. There were unforeseen complications in this process because Clearwell is a new eDiscovery program for EOIR, having been introduced to the agency in the Spring of 2017. Prior to this litigation, EOIR had not engaged in discovery requiring the production of electronically-stored documents on this scale or in conformance with the eDiscovery production specifications applicable in this case. Moreover, EOIR did not have technicians with experience manipulating Clearwell or managing this scope or type of discovery.

6. On December 12, 2017, attempted upload of files to Clearwell was unsuccessful. EOIR OGC then contacted Veritas for technical support assistance.

7. On December 15, 2017, after having reviewed EOIR's Clearwell error and service logs, Veritas advised EOIR OIT to scan and repair the original file and re-upload it to Clearwell. The files had corrupted when they were uploaded to Clearwell and the scan and repair process clears up the corruption issues before they are re-uploaded. This scan, repair, and upload process took several days.

8. On December 28 and 29, 2017, EOIR OGC worked with EOIR OIT to begin upload to Clearwell of the data for a more limited set of custodians. The custodians who were originally identified, but were not included in this limited set are individuals whose areas of responsibility are outside the Central District of California and law clerks. These custodians were not included in the limited set because their documents would be duplicative of those possessed by the custodians and/or outside the scope of the litigation.

January 2018 – Upload Issues to Clearwell and ROP Collection Complications

9. While the process of uploading custodian files and determining effective search terminology continued, EOIR also commenced work on collecting Records of Proceeding ("ROP") for production in response to the Plaintiffs' First Set of RFPs. The ROP is the official file created by the Immigration Court that contains the documents relating to an alien's case. A ROP may consist of one folder or a number of folders. The contents of the ROP vary from case to case. However, at the conclusion of Immigration Court proceedings, the ROP generally contains the Notice to Appear (Form I-862), hearing notice(s), the attorney's Notice of Appearance (Form EOIR-28), the Alien's Change of Address Form(s) (Form EOIR-33/IC), application(s) for relief, exhibits, motion(s), brief(s),

hearing tape(s) or digital audio recording(s) (DAR)(if any), and all written orders and decisions of the Immigration Judge.

10. On January 5, 2018, Plaintiffs provided Defendants with a list of 200 Alien Numbers for which Defendants had agreed to provide the ROPs. EOIR OGC began identifying the locations of all the folders that make up the ROP for each alien number, which took additional time because one alien number may be associated with a number of folders that are located at different immigration courts, the Board of Immigration Appeals, as well as one of the Federal Records Centers ("FRC"), where certain files associated with an ROP are warehoused when not in use. The FRCs are located outside the state of Virginia, where EOIR OGC is located. The majority of the warehoused ROPs were located, for example, at the FRC in Perris, California.

11. The ROP collection process was complex due to the number of files associated with each ROP, their different locations, and issues discovered concerning their completeness as described in paragraph 20. To ensure accuracy in this ROP collection, given the many moving parts involved, EOIR OGC created a spreadsheet to monitor and record the process. This spreadsheet is attached here. The ROPs were collected by alien number and organized in the spreadsheet by production date.

12. On January 10, 2018, EOIR OGC began to request these ROPs from the immigration courts, Board of Immigration Appeals, and/or the FRC. Once these ROPs arrived at EOIR OGC, because they are in paper hardcopy, they were sent out again to be scanned by an offsite contractor and the contents burned onto a CD. Moreover, sometimes a ROP contained an audio cassette, which contained the recording of a bond hearing. In order to produce these cassette recordings electronically, the cassettes were sent to another outside contractor through the Board of Immigration Appeals for copying to CD. The turnaround time for each cassette is 20 days. If the bond hearings were recorded by DAR, EOIR OGC downloaded each DAR from EOIR's database and saved it to EOIR's server before it was uploaded to the Justice Enterprise File Sharing ("JEFS") service, a file transfer service utilized by DOJ, to transmit the files to litigation counsel, the Office of Immigration Litigation – District Court Section ("OIL-DCS") for further review and production. If the case had been appealed to the Board of Immigration Appeals, the transcript of the hearings was available on EOIR's database. This transcript was then also downloaded and saved to EOIR's server before it was uploaded to JEFS for further review and production.

13. Depending on the size of each ROP, it took up to 2 weeks to receive the ROP and CD back from the contractor. Upon receiving the CD, EOIR

OGC uploaded the contents to the EOIR server, where it was saved before it was uploaded to JEFS. The last ROP scanned by the contractor was received back on February 14, 2018, with the associated CD.

14. By January 12, 2018, EOIR OIT had uploaded the first batch of custodian emails and other electronic files to Clearwell. However, this upload was incomplete in that it was missing the data associated with approximately 7 custodians. EOIR OGC began working with EOIR OIT to finish uploading the data associated with the remaining custodians.

15. On January 12, 2018, EOIR OGC distributed questionnaires to 6 of its custodians to help determine the most effective search terminology to return documents responsive to Plaintiffs' First Set of RFPs. These custodians were identified by EOIR as those who were believed to possibly have records responsive to Plaintiff's First Set of RFPs.

16. On January 17, 2018, EOIR OGC requested from the FOIA division of EOIR any documents that they might have already been provided to the public on issues related to the Plaintiffs' First Set of RFPs.

17. By January 18, 2018, EOIR OGC received back the questionnaires from the custodians along with documents or emails these custodians identified as responsive to Plaintiffs' First Set of RFPs.

18. On or about January 18, 2018, EOIR OGC applied search terminology to the custodian files uploaded into Clearwell that was informed by the

questionnaires and was broad enough to catch all communications and documents responsive to Plaintiffs' First Set of RFPs.

19. On January 23, 2018, EOIR OGC requested from EOIR's Office of Policy all EOIR trainings that relate to Plaintiffs' First Set of RFPs.

20. On or about January 24, 2018, EOIR OGC discovered its error in instructing the contractors scanning the ROPs to only scan the right hand sides of the files. After having reviewed the ROPs, EOIR OGC discovered that the left hand sides also contained bond related information that was relevant to the Plaintiffs' First Set of RFPs. Therefore, EOIR OGC began reviewing all of the already received scanned ROPs for completeness. Having so reviewed, EOIR OGC began to re-request the files to scan the left hand sides in-house at EOIR. This process added additional time to the collection of the ROPs.

21. On January 24, 2018, EOIR OGC received documents from the FOIA division of EOIR that had been provided in response to requests on issues related to the Plaintiffs' First Set of RFPs.

22. On January 30, 2018, Clearwell continued to exhibit errors when displaying the custodians' emails and files, which prevented the text of the records from showing. EOIR OGC contacted EOIR OIT for technical assistance, who then consulted with Veritas.

February 2018 – Upload Issues to Clearwell and Relativity and ROP Collection/Production

23. On February 1, 2018, EOIR OGC attempted again to import the remaining custodians' Outlook email files into Clearwell but the import failed.

24. On February 3, 2018, EOIR OIT completed a scan and repair of the remaining custodian's files.

25. On February 4, 2018, EOIR OGC successfully imported the remaining custodian's files into Clearwell.

26. On February 8, 2018, EOIR OGC attempted and failed to send three exports of files from Clearwell (after the application of search terms) to litigation counsel to be placed on OIL-DCS's eDiscovery platform, Relativity, for review.

27. There were unforeseen complications in the export process because Veritas is a new eDiscovery program for EOIR, and the export/import of the data required extensive testing between EOIR and OIL-DCS's review platforms.

28. Between February 8, 2018 and February 12, 2018, EOIR OGC transferred several test versions of data to OIL-DCS through the usage of JEFS to ensure that OIL-DCS's e-Discovery platform could properly import the data included in the EOIR production export.

29. On February 13, 2018, Clearwell had server issues which required it to be restarted and a new patch sent from Veritas technical support.

30. On February 14, 2018, EOIR OGC received from EOIR's Office of Policy all EOIR trainings that relate to Plaintiffs' First Set of RFPs.

31. On February 16, 2018, after testing several test versions of EOIR data, OIL-DCS confirmed that one of the three Clearwell exports, which contained just over 3,000 reviewable items (a fraction of the total number of items in the three exports) had been properly imported by OIL-DCS and assigned to three EOIR OGC attorneys and one contractor for review of the individual search results.

32. On February 19, 2018, EOIR OIT notified EOIR OGC that the imports had surpassed the processing capacity of Clearwell. EOIR then had to request, and ultimately received, temporary licensing to increase the capacity of Clearwell.

33. On February 20, 2018, EOIR OGC requested and received technical support from Veritas regarding the hash value metadata field and whether all document families (all the attachments associated with each document), were included in each export.

34. On February 22, 2018, EOIR OGC re-attempted to send the remaining two exports to OIL-DCS's Relativity platform.

March 2018 – Upload Issues to Relativity and ROP Collection/Production

35. Throughout the month of March, EOIR OGC continued the collection and review of missing files for each ROPs. Three attorneys, one contractor, and one paralegal were assigned to these tasks.

36. On March 1, 2018 – OIL-DCS informed EOIR OG that its re-attempt to send the remaining two exports was unsuccessful. EOIR OGC and OIL-DCS conferred on possible solutions.

37. On March 6, 2018 – EOIR again requested and received an additional temporary license (because the previous one expired) to expand the capacity of Clearwell to support the high volume of files being imported into Clearwell and processed.

38. On March 8, 2018, Plaintiffs sent Defendants a letter requesting additional information about Defendants' custodians, search term "hit" reports, and backup tapes.

39. On March 9, 2018, EOIR OGC exported overlays with additional metadata elements required for OIL-DCS to complete the import of remaining files into Relativity.

40. On March 12, 2018, EOIR OGC re-attempted the two remaining exports (with changes to metadata being transferred to OIL-DCS).

41. On March 26 and 27, 2018, EOIR OGC ran random sample reports on Clearwell using the additional search terms that Plaintiffs had

recommended to prepare for a meet and confer following Plaintiff's March 8, 2018 letter (see par. 38).

42. On March 30, 2018, EOIR OGC, through litigation counsel, produced 185 files constituting ROPs to Plaintiffs.

April 2018 – Upload Issues to Relativity and ROP Collection/Production

43. Throughout the month of April, EOIR OGC continued collection of missing files for each ROP, oversaw the transfer of the files to OIL-DCS for uploading to Relativity, and reviewed the files for privilege prior to production by OIL-DCS to Plaintiffs. Three attorneys, one contractor, and one paralegal were assigned to these tasks.

44. On April 9, 2018, the temporary license expired for the additional electronic storage space needed. EOIR had not yet finalized its procurement of permanent additional space. In order to maintain the capacity to continue working on discovery in *Hernandez*, EOIR OGC immediately archived old or inactive files associated with other litigation as well as active files that did not have immediate production deadlines associated with other litigation.

45. On April 30, 2018, EOIR OGC produced 223 files constituting ROPs to Plaintiffs.

May 2018 – Upload Issues to Relativity and ROP Collection/Production

46. Throughout the month of May, EOIR OGC continued collection of missing files for each ROP, transfer to OIL-DCS for upload into its Relativity system, and review of these files before production to Plaintiffs. Three attorneys, one contractor, and one paralegal were assigned to these tasks.

47. On May 3, 2018, EOIR OGC met with OIL-DCS attorneys and technicians with the DOJ Civil Division's Office of Litigation Support to discuss modifying export parameters so that import into Relativity would provide OIL-DCS with the ability to review, the length of time required to process files, the size limitations involved, and capacity and appliance issues.

48. On May 30, 2018, EOIR OGC produced 223 files constituting ROPs to Plaintiffs.

June 2018 – Upload Issues to Relativity Continue

49. On June 7, 2018, EOIR OGC contacted Veritas technical support to discuss all the challenges encountered with export from Clearwell and import into Relativity. OIL-DCS reported that the data received from EOIR was not always viable.

50. On June 14, 2018, EOIR OGC and e-Discovery technicians with the DOJ Civil Division's Office of Litigation Support discussed next steps

regarding the hard drive transfer problems that both platforms were encountering. EOIR OGC then contacted the Clearwell technicians and received technical support.

51. On June 15, 2018, EOIR OGC completed first-line review for relevance and privilege of the three thousand documents that had been successfully exported to and loaded onto Relativity.

July 2018 – Forward Planning

52. Since the Special Master issued her order on July 10, 2018, EOIR OGC has been working closely with litigation counsel to complete the data transfer between Clearwell and Relativity. EOIR OGC has assigned a new eDiscovery specialist to the task in order to more efficiently address data transfer issues between Clearwell and the newly-dedicated specialist has had success in resolving prior data transfer problems.

53. It is my understanding that the total data transfer to Relativity consists of approximately 30,000 items that need to be reviewed by OGC attorneys, identified for responsiveness, and redacted for any privilege or applicable protection in accordance with both federal law and the protective order.

54. EOIR estimates an employee can review approximately 30 items in an hour for responsiveness and privilege, including marking for privilege or other appropriate redactions. Accordingly, it will take approximately 1,000 employee hours to complete the data review of all 30,000 items.

55. I estimate that on account of other ongoing agency demands of the General Counsel's Office (OGC), including competing litigation demands in the approximately 15 active class action cases with ongoing discovery, depositions, and responsive filing deadlines, only approximately 6 OGC employees are available part-time to perform the extensive review and technical work I have described in this affidavit. As noted, OGC has added an eDiscovery specialist. OGC only has one office in Falls Church, Virginia, with a current staff size of 38 federal employee attorneys and support staff. OGC supports litigation, policy, regulations, the fraud program, the attorney discipline program, FOIA, employee-labor relations, ethics, records management and privacy for the agency. As such, 6 employees represents fifteen percent of our office staff to work on discovery in this single litigation.

56. Therefore, given the steps necessary for EOIR to complete export to OIL of EOIR's search results, the large amount of data (approximately 30,000 reviewable items) identified for review, and the subsequent amount of time needed to review the 30,000 items for responsiveness and privilege, EOIR estimates that it will require up to 5 months to complete its production in response to Plaintiffs' First Set of RFPs.

57. If the relevant time frame is narrowed to January 1, 2016 to January 31, 2018 (or the collection dates referenced in the Rule 26(f) report to be field

by the parties), we approximate the volume of data to be reviewed will be significantly reduced. Reducing the number of custodians would further reduce the time needed to complete production.

58. As mentioned in the previous paragraph, EOIR is amenable to prioritizing document review by custodian. EOIR has reviewed the list of custodians and makes the following proposal with respect to the order of review. First, EOIR will review the records for the Assistant Chief Immigration Judges (ACIJs) Rodin Rooyani and Scott Laurent, as they are the ACIJs for the Immigration Courts in the Central District of California. EOIR believes that review of the other ACIJs who do not have any courts within the Central District of California should not be prioritized, as those ACIJs are likely to only have duplicative documents if they have any responsive documents at all. Second, EOIR proposes to review the records for Deputy Chief Immigration Judge (DCIJ) Print Maggard, as DCIJ Maggard oversees ACIJs Rooyani and Laurent. EOIR believes that DCIJ Mary Cheng's documents are likely to be duplicative if she has any responsive documents at all, as she is not responsible for any oversight over the ACIJs, Immigration Judges or Immigration Courts in the Central District of California. Third, EOIR proposes to review the records for Stephen Griswold, former ACIJ for Publications and Policy, Jack Weil, former ACIJ for Training, and Abigail Price, former ACIJ for Vulnerable

Populations, as they are likely to have documents that are directly responsive to Plaintiff's discovery requests and may have documents that are not duplicative of the other custodians. Fourth, EOIR proposes to review the records for the Chief Immigration Judge Marybeth Keller, who oversees all of the above-named individuals and is responsible for authorizing the issuance of policies and publications for the Office of the Chief Immigration Judge. EOIR believes that the headquarters DCIJs Michael McGoings, Ed Kelly, Christopher Santoro are likely to be duplicative of Chief Judge Keller and DCIJ Maggard's document if they have any responsive documents at all, as these individuals would disseminate any policies, procedures or practices approved by the Chief Judge through the field DCIJs to disseminate to the local ACIJs. Former ACIJ Thomas Fong retired on January 3, 2016, and as such would not have any documents to review from 2016 to the present. Chief Judge Brian O'Leary joined the Board of Immigration Appeals in a non-managerial position on July 25, 2015, and would not have any documents to review from 2016 to the present.

59. Ben McDowell, a program analyst for EOIR's Planning, Statistics, and Analysis Division,[2] is not and has never been included in EOIR's list of custodians. Mr. McDowell was identified in Defendants' initial

[2] This division has been recently renamed and is currently called "Planning, Analysis, and Statistics Division."

disclosures as a person who may have discoverable information that Defendants may use to support their defenses only because he provided responses to Plaintiffs' First Set of RFPs, Requests No. 1 and 2. Those Requests sought information and reports from databases. Mr. McDowell thus has information on how he compiled this data from the databases, and has signed a declaration indicating how he compiled this data. Due to the nature of his position as program analyst, Mr. McDowell would not have responsive documents to Plaintiffs' First Set of RFPs paragraphs 3 through 9. Accordingly, EOIR did not designate him as a custodian for document collection.

60. EOIR is capable of producing the remaining documents responsive to Plaintiffs' First Set of RFPs on a rolling basis beginning on August 3 as ordered.

Conclusion

I declare under penalty of perjury of the laws of the United States and the State of Virginia that the foregoing is true and correct to the best of my knowledge and belief.

July 20, 2018

Jean King
General Counsel
Falls Church, VA

Production #1 February 2018: Exhibit to Declaration of Jean King, July 20, 2018

	A	B	C	D	E	F	G	H	I
1	**Alien Number**	**Location of ROP Contents**	**# of Bond Hearing DARS or Bond Hearing Transcripts Hearing Transcripts**	**Tapes?**	**ROPs Requested**	**ROPs Received**	**Sent out to Offsite Contractor for Duplication**	**Returned from Offsite Contractor**	**Uploaded to EOIR's Server**
2	XXXXXXXXX	LOS	2	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/22, 1/23, 1/31
3	XXXXXXXXX	LOS	4	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/22, 1/23, 2/7
4	XXXXXXXXX	LOS	3	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/24, 2/7, 2/13
5	XXXXXXXXX	LOS	2	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/22, 1/23
6	XXXXXXXXX	LOS	4	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/22, 1/24
7	XXXXXXXXX	LOS	8	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/22, 1/23, 2/7
8	XXXXXXXXX	LOS	1	NO	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/22
9	XXXXXXXXX	LOS	4	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/22, 1/23
10	XXXXXXXXX	ADL	1	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/22, 1/24
11	XXXXXXXXX	LAD	1	No	1/10/2018	1/11/2018	1/11/2018	1/18/2018	1/16, 1/19, 2/1
12	XXXXXXXXX	LOS	2	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/19, 1/24, 2/13
13	XXXXXXXXX	LOS	0	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/26, 2/7
14	XXXXXXXXX	LOS	1	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/22, 1/23, 2/7
15	XXXXXXXXX	LOS	1	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/22, 1/23, 2/7
16	XXXXXXXXX	LOS	3	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/24
17	XXXXXXXXX	ADL	0	No	1/10/2018	1/23/2018	1/24/2018	1/31/2018	2/15
18	XXXXXXXXX	LOS/ADL	5	No	n/a	n/a	1/12/2018	1/22/2018	1/19, 1/23, 2/13
19	XXXXXXXXX	LOS	1	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/22, 1/23, 2/7
20	XXXXXXXXX	LOS	2	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/24, 2/7
21	XXXXXXXXX	LOS/LAD	4	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/22, 1/23, 2/8
22	XXXXXXXXX	LAD	2	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/18, 1/23
23	XXXXXXXXX	LOS	1	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/19, 1/23, 2/7
24	XXXXXXXXX	ADL/LOS	1	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/24, 2/7
25	XXXXXXXXX	LOS/ADL	4	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/22, 1/23
26	XXXXXXXXX	LOS/ADL	1	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/22, 1/23, 2/7
27	XXXXXXXXX	LOS/ADL	3	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/19, 1/23, 2/7
28	XXXXXXXXX	LOS/ADL	2	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/22, 1/24
29	XXXXXXXXX	ADL	3	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/19, 1/23
30	XXXXXXXXX	HOU/ADL	3	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/18, 1/24, 2/13
31	XXXXXXXXX	SFR/ADL	2	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/18, 1/24, 2/13
32	XXXXXXXXX	LAD	1	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/22, 1/23
33	XXXXXXXXX	LAD	1	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/22, 1/23
34	XXXXXXXXX	ADL	2	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/24, 2/22
35	XXXXXXXXX	SFR/ADL	2	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/18, 1/23
36	XXXXXXXXX	ADL	3	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/18, 1/23, 2/16
37		**Total**	**80**						
38	**Note:** Where a cell is marked with n/a, this signifies that a record of the date of the action was not kept.								

Production #2 March 2018: Exhibit to Declaration of Jean King, July 20, 2018

	A	B	C	D	E	F	G	H	I
1	**Alien Number**	**Location of ROP Contents**	**# of Bond Hearing DARS or Bond Hearing Transcripts Hearing Transcripts**	**Tapes?**	**ROPs Requested**	**ROPs Received**	**Sent out to Offsite Contractor for Duplication**	**Returned from Offsite Contractor**	**Uploaded to EOIR's Server**
2	XXXXXXXXX	ADL	1	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	3/6
3	XXXXXXXXX	LAD	5	No	1/10/2018	1/25/2018	1/25/2018	2/1/2018	3/8
4	XXXXXXXXX	ADL	5	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	3/24, 3/27, 5/22
5	XXXXXXXXX	LAD	3	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	3/8
6	XXXXXXXXX	ADL	2	NO	1/10/2018	1/23/2018	1/23/2018	1/30/2018	2/15
7	XXXXXXXXX	LAD	3	No	1/10/2018	1/23/2018	1/23/2018	1/31/2018	2/20
8	XXXXXXXXX	LAD	2	No	1/10/2018	1/23/2018	1/23/2018	1/23/2018	2/16
9	XXXXXXXXX	ADL	2	No	1/10/2018	1/23/2018	1/23/2018	2/1/2018	3/6
10	XXXXXXXXX	ADL/LOS	2	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/23
11	XXXXXXXXX	LAD	4	No	1/10/2018	1/23/2018	1/23/2018	1/30/2018	3/23
12	XXXXXXXXX	ADL	5	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	3/15
13	XXXXXXXXX	LOS	1	No	1/10/2018	2/5/2018	2/7/2018	2/14/2018	3/15
14	XXXXXXXXX	ADL	2	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	3/15
15	XXXXXXXXX	ADL	6	No	1/10/2018	1/23/2018	1/24/2018	1/25/2018	3/16
16	XXXXXXXXX	LOS	1	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/31, 3/27
17	XXXXXXXXX	LAD	3	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	3/16
18	XXXXXXXXX	LAD	4	no	1/10/2018	1/23/2018	1/24/2018	2/1/2018	3/16
19	XXXXXXXXX	LAD	1	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	3/16
20	XXXXXXXXX	ADL	3	No	1/10/2018	1/23/2018	1/24/2018	1/30/2018	3/15
21	XXXXXXXXX	LAD	2	No	1/10/2018	1/23/2018	1/23/2018	1/30/2018	3/6
22	XXXXXXXXX	ADL	1	No	1/10/2018	1/23/2018	1/23/2018	1/30/2018	3/15
23	XXXXXXXXX	ADL	2	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/15
24	XXXXXXXXX	ADL	7	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/15
25	XXXXXXXXX	ADL	3	No	01/10/18	1/16/2018	1/16/2018	1/24/2018	3/14
26	XXXXXXXXX	adl	1	No	1/10/2018	1/23/2018	1/24/2018	1/31/2018	3/15
27	XXXXXXXXX	ADL	3	No	01/10/18	1/16/2018	1/16/2018	1/24/2018	3/15
28	XXXXXXXXX	adl	1	no	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/15
29	XXXXXXXXX	ADL	1	no	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/17, 1/23
30	XXXXXXXXX	ADL	1	no	1/10/2018	1/23/2018	1/24/2018	1/31/2018	3/15
31	XXXXXXXXX	ADL	1	No	01/10/18	1/16/2018	1/16/2018	1/24/2018	3/14
32	XXXXXXXXX	LAD	1	no	1/10/2018	1/16/2018	1/16/2018	1/25/2018	3/14
33	XXXXXXXXX	BOS/ADL	2	no	1/10/2018	1/11/2018	1/12/2018	1/22/2018	3/14
34	XXXXXXXXX	adl	2	no	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/14
35	XXXXXXXXX	ADL	2	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/14
36	XXXXXXXXX	ADL	2	no	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/12
37	XXXXXXXXX	ADL	2	no	1/10/2018	1/17/2018	1/17/2018	1/25/2018	3/11
38	XXXXXXXXX	ADL	3	no	1/10/2018	1/16/2018	1/16/2018	1/25/2018	3/12
39	XXXXXXXXX	adl	1	no	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/12
40	XXXXXXXXX	adl	1	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/12
41	XXXXXXXXX	adl	2	no	1/10/2018	1/16/2018	1/16/2018	1/25/2018	3/14
42	XXXXXXXXX	adl	4	no	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/12
43	XXXXXXXXX	ADL	1	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/12
44	XXXXXXXXX	ADL	4	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/12
45	XXXXXXXXX	ADL	2	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/12
46	XXXXXXXXX	LAD/LOS	5	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/31, 3/11
47	XXXXXXXXX	ADL	1	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/9
48	XXXXXXXXX	ADL	1	no	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/9
49	XXXXXXXXX	ADL	1	No	n/a	n/a	1/16/2018	1/24/2018	3/9
50	XXXXXXXXX	ADL	2	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/9
51	XXXXXXXXX	MIA/ADL	1	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/9
52	XXXXXXXXX	ADL	1	no	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/9
53	XXXXXXXXX	ADL	1	no	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/9
54	XXXXXXXXX	LAD	3	no	1/10/2018	1/16/2018	1/16/2018	1/25/2018	3/9
55	XXXXXXXXX	ADL	1	no	1/10/2018	2/7/2018	2/7/2018	2/14/2018	3/9
56	XXXXXXXXX	ADL	1	no	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/9
57	XXXXXXXXX	LAD	1	no	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/9
58	XXXXXXXXX	ADL	1	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/9
59	XXXXXXXXX	LAD	1	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/8
60	XXXXXXXXX	ADL	1	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/23
61	XXXXXXXXX	ADL	1	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	3/8
62		**Total**	**130**						
63	**Note:** Where a cell is marked with n/a, this signifies that a record of the date of the action was not kept.								

Production #3 April 2018: Exhibit to Declaration of Jean King, July 20, 2018

	A	B	C	D	E	F	G	H	I
1	**Alien Number**	**Location of ROP Contents**	**# of Bond Hearing DARS or Bond Hearing Transcripts Hearing Transcripts**	**Tapes?**	**ROPs Requested**	**ROPs Received**	**Sent out to Offsite Contractor for Duplication**	**Returned from Offsite Contractor**	**Uploaded to EOIR's Server**
2	XXXXXXXXX	PHO/FRC/ADL	3	Y (no bonds)	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/19, 1/22, 3/29, 5/2
3	XXXXXXXXX	ADL/FRC	4	Y (no bonds)	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/29
4	XXXXXXXXX	ADL	2	N	1/10/2018	1/16/2018	1/16/2018	1/24/2018	4/15, 4/19, 4/24
5	XXXXXXXXX	ADL	4	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	4/15, 4/19, 4/24
6	XXXXXXXXX	FRC/ADL	1	Y (no bonds)	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/29
7	XXXXXXXXX	ADL	1	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	4/16, 4/19, 4/24
8	XXXXXXXXX	ADL	6	No	1/10/2018	1/23/2018	1/23/2018	1/30/2018	4/19, 4/24, 5/22
9	XXXXXXXXX	LAD	3	No	1/10/2018	1/23/2018	1/23/2018	1/30/2018	4/16, 4/19, 4/26
10	XXXXXXXXX	LAD	3	NO	n/a	n/a	1/17/2018	1/25/2018	4/17
11	XXXXXXXXX	LAD	6	No	1/10/2018	1/23/2018	1/24/2018	1/31/2018	3/30
12	XXXXXXXXX	ADL	6	No	n/a	n/a			4/10
13	XXXXXXXXX	ADL	1	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	3/30
14	XXXXXXXXX	ADL	3	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	1/24, 4/9, 4/20
15	XXXXXXXXX	LOS/FRC	1	Y (no bonds)	1/10/2018	1/16/2018	1/16/2018	1/24/2018	1/24, 4/9
16	XXXXXXXXX	LAD	1	no	1/10/2018	1/23/2018	1/24/2018	2/1/2018	3/28
17	XXXXXXXXX	ADL	5	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	4/15
18	XXXXXXXXX	ADL	2	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	4/19, 4/24
19	XXXXXXXXX	ADL	2	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	4/18
20	XXXXXXXXX	LOS	1	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	4/18, 4/24
21	XXXXXXXXX	LAD	3	NO	1/10/2018	1/23/2018	1/23/2018	1/30/2018	1/25, 4/9, 4/20
22	XXXXXXXXX	ADL	2	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	4/18
23	XXXXXXXXX	LAD/LOS	4	No	1/10/2018	1/23/2018	1/23/2018	1/30/2018	1/25, 4/19, 4/26
24	XXXXXXXXX	ADL	3	No	1/10/2018	1/11/2018	1/11/2018	1/18/2018	1/16, 4/18,
25	XXXXXXXXX	LAD	5	No	n/a	n/a	1/17/2016	1/25/2018	4/9, 4/17, 4/20
26	XXXXXXXXX	ADL	9	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/22, 4/18
27	XXXXXXXXX	ADL/LOS	10	No	1/10/2018	1/23/2018	1/23/2018	1/30/2018	1/25, 4/11
28	XXXXXXXXX	LAD/FRC	2	No	1/10/2018	1/23/2018	1/24/2018	1/31/2018	4/18
29	XXXXXXXXX	LAD	5	No	1/10/2018	1/23/2018	1/24/2018	1/31/2018	1/25, 4/19, 4/24
30	XXXXXXXXX	ADL	3	No	1/10/2018	1/23/2018	1/24/2018	2/1/2018	4/19
31	XXXXXXXXX	ADL	1	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	4/18
32	XXXXXXXXX	ADL	2	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/19, 4/19, 4/24
33	XXXXXXXXX	ADL	1	No	1/10/2018	1/23/2018	1/24/2018	1/31/2018	3/28
34	XXXXXXXXX	ADL	2	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	4/18
35	XXXXXXXXX	LOS	3	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/19, 4/19, 4/24
36	XXXXXXXXX	LAD	10	No	1/10/2018	1/23/2018	1/24/2018	2/1/2018	1/30, 4/18, 4/26, 5/22
37	XXXXXXXXX	LAD	2	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	1/25, 4/19, 4/25
38	XXXXXXXXX	LAD/FRC/LOS	4	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/22, 5/22
39	XXXXXXXXX	LOS	2	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	1/24, 4/19, 4/24
40	XXXXXXXXX	LAD	7	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	1/24, 4/18, 4/26
41	XXXXXXXXX	LAD/ADL	6	No	1/10/2018	1/23/2018	1/24/2018	2/1/2018	4/19, 4/25
42	XXXXXXXXX	ADL	4	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	1/24, 4/9, 5/22
43	XXXXXXXXX	ADL	9	No	1/10/2018	1/23/2018	1/24/2018	2/1/2018	1/29, 4/12, 4/20, 4/24
44	XXXXXXXXX	LAD	3	No	1/10/2018	1/11/2018	1/11/2018	1/18/2018	1/16, 1/17, 4/26
45	XXXXXXXXX	ADL	2	No	01/10/18	1/16/2018	1/16/2018	1/24/2018	1/25, 4/12, 4/20
46	XXXXXXXXX	LAD	1	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	4/15, 4/25
47	XXXXXXXXX	ADL	4	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	4/19, 4/24
48	XXXXXXXXX	ADL	2	No	n/a	n/a	1/17/2018	1/25/2018	1/24, 4/11, 4/12, 5/22
49	XXXXXXXXX	ADL	4	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	4/16, 4/24
50	XXXXXXXXX	LAD	4	No	1/10/2018	1/11/2018	1/11/2018	1/18/2018	1/16, 4/19, 4/25
51	XXXXXXXXX	ADL	1	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	4/19, 4/24
52	XXXXXXXXX	ADL	1	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	4/19, 4/24
53	XXXXXXXXX	LAD	2	No	n/a	n/a	1/17/2018	1/25/2017	1/25, 4/9, 4/21, 5/22
54	XXXXXXXXX	ADL	4	No	1/10/2018	1/23/2018	1/24/2018	2/1/2018	4/19, 4/24
55	XXXXXXXXX	ADL	1	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	1/23, 4/9, 4/20
56	XXXXXXXXX	LAD	1	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/19, 4/9, 4/26
57		**Total**	**184**						
58	**Note:** Where a cell is marked with n/a, this signifies that a record of the date of the action was not kept.								

Production #4 May 2018: Exhibit to Declaration of Jean King, July 20, 2018

	A	B	C	D	E	F	G	H	I
1	**Alien Number**	**Location of ROP Contents**	**# of Bond Hearing DARS or Bond Hearing Transcripts Hearing Transcripts**	**Tapes?**	**ROPs Requested**	**ROPs Received**	**Sent out to Offsite Contractor for Duplication**	**Returned from Offsite Contractor**	**Uploaded to EOIR's Server**
2	XXXXXXXXX	LOS/FRC	5	Y (but no bonds)	1/10/2018	1/11/2018	1/11/2018	1/18/2018	1/17, 5/4, 5/8, 5/15
3	XXXXXXXXX	ADL/FRC	1	Y (but no bonds)	01/10/18	1/16/2018	1/16/2018	1/24/2018	3/28, 4/26
4	XXXXXXXXX	LAD	8	No	1/10/2018	1/23/2018	1/23/2018	1/31/2018	4/15, 5/2, 5/18
5	XXXXXXXXX	LOS	1	No	1/10/2018	1/16/2018	1/16/2018	1/23/2018	4/15, 5/2, 5/11
6	XXXXXXXXX	LAD/LOS	3	Y (but no bonds)	1/10/2018	1/11/2018	1/11/2018	1/18/2018	1/17, 1/24, 5/2
7	XXXXXXXXX	ADL	7	No	1/10/2018	1/23/2018	1/24/2018	1/31/2018	4/15, 5/11
8	XXXXXXXXX	LOS/FRC	6	Y	1/10/2018	1/16/2018	1/16/2018	1/24/2018	4/16, 5/11, 5/17
9	XXXXXXXXX	ADL/FRC/LOS	6	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	4/16, 5/11, 5/18
10	XXXXXXXXX	LAD	2	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	4/16, 5/2
11	XXXXXXXXX	LAD	2	No	1/10/2018	1/23/2018	1/24/2018	1/31/2018	5/2, 5/15
12	XXXXXXXXX	LAD	1	No	1/10/2018	1/17/2018	1/17/2017	1/25/2018	5/2, 5/15
13	XXXXXXXXX	LOS/FRC	1	Y (but no bonds)	1/10/2018	1/11/2018	1/12/2018	1/22/2018	4/16, 5/2, 5/18
14	XXXXXXXXX	LAD	5	No	3/29/2018	n/a	4/24/2018	5/1/2018	4/16, 5/3, 5/15
15	XXXXXXXXX	LOS	2	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	4/16, 5/11
16	XXXXXXXXX	LAD/FRC	3	Y (but no bonds)	1/10/2018	1/23/2024	1/24/2018	1/31/2018	1/16, 1/17, 5/2, 5/11, 5/17
17	XXXXXXXXX	LAD	6	No	n/a	n/a	4/24/2018	5/1/2018	5/3, 5/15
18	XXXXXXXXX	ADL	0	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	5/9, 5/2
19	XXXXXXXXX	ADL/FRC	9	Y (but no bonds)	1/10/2018	1/16/2018	1/16/2018	1/24/2018	4/15, 4/26
20	XXXXXXXXX	ADL/LAD/FRC	4	Y (but no bonds)	1/10/2018	1/16/2018	1/16/2018	1/25/2018	5/2, 5/11
21	XXXXXXXXX	LAD/LOS	1	No	n/a	n/a	n/a	n/a	5/4, 5/17
22	XXXXXXXXX	ADL	2	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	1/24, 5/2, 5/15
23	XXXXXXXXX	ADL	5	No	1/10/2018	1/23/2018	1/24/2018	1/30/2018	5/2, 5/11
24	XXXXXXXXX	ADL/FRC/LAD	17	Y (but no bonds)	n/a	n/a	4/24/2018	n/a	5/3
25	XXXXXXXXX	ADL	4	No	1/10/2018	1/23/2018	1/24/2018	2/1/2018	3/15
26	XXXXXXXXX	LOS	6	No	n/a	n/a	4/24/2018	n/a	5/3
27	XXXXXXXXX	ADL	4	No	n/a	n/a	n/a	n/a	4/25, 5/17, 5/18
28	XXXXXXXXX	NYC	1	No	n/a	n/a	n/a	n/a	5/4, 5/15
29	XXXXXXXXX	ADL	5	No	n/a	n/a	4/24/2018	n/a	5/3, 5/17
30	XXXXXXXXX	NYC	2	No	n/a	n/a	n/a	n/a	5/4
31	XXXXXXXXX	NYC	3	No	n/a	n/a	n/a	n/a	5/4, 5/15
32	XXXXXXXXX	NYC	2	No	n/a	n/a	n/a	n/a	5/4, 5/15
33	XXXXXXXXX	ADL	5	No	n/a	n/a	4/24/2018	n/a	5/3
34	XXXXXXXXX	HAR/FRC	1	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	1/18, 1/24, 5/9
35	XXXXXXXXX	ADL	2	No	1/10/2018	2/5/2018	2/7/2018	n/a	5/4, 5/22
36	XXXXXXXXX	LAD	1	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	5/4
37	XXXXXXXXX	ADL	2	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	5/4, 5/10
38	XXXXXXXXX	LAD	4	No	1/10/2018	2/5/2018	2/7/2018	2/14/2018	5/4, 5/10
39	XXXXXXXXX	NYC	1	No	n/a	n/a	n/a	n/a	5/4, 5/15
40	XXXXXXXXX	LAD	3	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	5/4, 1/23
41	XXXXXXXXX	ADL	4	No	n/a	n/a	4/24/2018	n/a	5/3
42	XXXXXXXXX	NYC	0	No	n/a	n/a	n/a	n/a	5/15
43	XXXXXXXXX	Adl	3	No	n/a	n/a	n/a	n/a	5/4, 5/15, 5/18
44	XXXXXXXXX	ADL	2	No	1/10/2018	1/23/2018	1/24/2018	2/1/2018	5/4, 5/10
45	XXXXXXXXX	ORL	2	No	1/10/2018	1/16/2018	1/16/2018	1/24/2018	5/4, 5/22
46	XXXXXXXXX	NYC	1	No	n/a	n/a	n/a	n/a	5/4, 5/15
47	XXXXXXXXX	LAD	4	No	n/a	n/a	4/24/2018	n/a	5/3
48	XXXXXXXXX	LAD	3	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	5/4, 5/11, 5/15
49	XXXXXXXXX	LAD	1	No	n/a	n/a	n/a	n/a	5/4, 5/11
50	XXXXXXXXX	ADL	3	No	1/10/2018	1/11/2018	1/12/2018	1/22/2018	1/23, 5/4, 5/18
51	XXXXXXXXX	LAD	4	No	1/10/2018	1/16/2018	1/16/2018	1/25/2018	5/4, 5/11, 5/15
52		**Total**	**170**						
53									
54	**Note:** Where a cell is marked with n/a, this signifies that a record of the date of the action was not kept.								